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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
And RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
No. 23-cv-06708

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF LAURA VARTAIN
HORN IN SUPPORT OF DEFENDANTS
UBER TECHNOLOGIES, INC., RASIER,
LLC, AND RASIER-CA, LLC'S REPLY IN
SUPPORT OF ITS MOTIONS TO EXCLUDE
EXPERT TESTIMONY**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

**DECLARATION OF LAURA VARTAIN HORN ISO DEFENDANTS' REPLY ISO MOTIONS TO
EXCLUDE EXPERT TESTIMONY**

Case No. 3:23-md-03084-CRB (LJC)

1 I, Laura Vartain Horn, declare as follows:

2 1. I am an attorney at law duly admitted to practice before the courts of the State of California
3 and a partner with the law firm of Kirkland & Ellis LLP, counsel of record for Defendants Uber
4 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”) in this action. I have personal
5 knowledge of each and all of the facts stated in this declaration and, if called as a witness, could and would
6 competently testify to the facts contained herein.

7 2. Attached hereto as **Exhibit 1** is a true and correct copy of an Order granting Defendants’
8 Motion to Exclude the Expert Testimony of Dr. Minette Drumwright in *Social Media Cases*, JCCP5255.

9 3. Attached hereto as **Exhibit 2** is a true and correct copy of the Order Ruling On the Motions
10 *In Limine* for October 2025 Trial in *In re Lyft Rideshare Cases*, No. CJC-20-005061 (Sept. 12, 2025).

11 4. Attached hereto as **Exhibit 3** is a true and correct copy the transcript of the deposition of
12 Dr. Lindsey Cameron, taken on November 12, 2025.

13 I declare under penalty of perjury under the laws of the United States and the State of California
14 that the foregoing is true and correct.

15 Executed on December 23, 2025, in San Francisco, California.

16
17 /s/ Laura Vartain Horn
18 *Laura Vartain Horn*
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